

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
Plaintiff,)	
)	No. 08 CR 491
v.)	(No. 2:06 CR 50 RL, Indiana No.)
)	Judge James B. Zagel
NICULAE TUDOR,)	
Defendant.)	

**DEFENDANT NICULAE TUDOR'S UNOPPOSED MOTION FOR
EARLY TERMINATION OF PROBATION**

Now comes the Defendant, NICULAE TUDOR, by and through his attorney, Steven Shobat, 53 West Jackson Boulevard, Suite 1603, Chicago, Illinois, 60604, and hereby files this motion to terminate early the defendant's period of probation. In support of the motion, the defendant states as follows.

1. On March 23, 2007, Judge Rudy Lozano sentenced the defendant to a term of two years of probation with a special condition of home detention for four months following entry of a guilty plea to one count of conspiracy to travel in interstate commerce to facilitate illegal prostitution activities in violation of Title 18, United States Code, Section 1952 (a) (3) and 371. In addition to the above sentence, the defendant was given a special assessment of \$100.00 dollars and a restitution requirement in the amount of \$25,000.00 dollars.

2. Pursuant to Title 18, United States Code, Section 3564(c), this Court may terminate early the period of probation at any time after one year in the case of a felony. The defendant has been on probation in excess of one year.

3. The defendant has completed all of the provisions of his probation fully and successfully. He completed his home confinement satisfactorily. The defendant paid his special

assessment immediately and on January 14, 2008, the South Bend clerk's office confirmed that defendant paid in full the restitution requirement of \$25,000.00. The defendant has followed and adhered to all the provisions of his probation successfully and without incident.

4. The undersigned counsel contacted both Assistant United States Attorney Thomas S. Ratcliffe (who is the prosecutor who was assigned to the case and prosecuted the matter) and United States Probation Officer Scott Rosenthal regarding the request for early termination. Neither AUSA Ratcliffe nor Probation Officer Rosenthal oppose granting early termination to the defendant.

5. This case was transferred from the Northern District of Indiana to the Northern District of Illinois for purposes of monitoring the defendant's probation. Defendant Tudor resides in the Northern District of Illinois. Probation Officer Rosenthal, although assigned to the Northern District of Illinois, has been Mr. Tudor's probation officer throughout his probation period.

WHEREFORE as defendant has completed every requirement of his probation fully, completely and without incident, defendant NICULAE TUDOR respectfully requests that this Court enter an order terminating defendant's period of probation early as having been satisfactorily completed.

Respectfully submitted,

/s/Steven Shobat
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Attorney for Niculae Tudor

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